

United States District Court

for the
Western District of New York



United States of America

v.

TIMOTHY MEACHAM
a/k/a Stephen Forsythe,
Defendant

Case No. 17-MJ-4090

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of May 15, 2017, in the County of Monroe, in the Western District of New York, the defendant violated 18 U.S.C. §485, said offense described as follows:

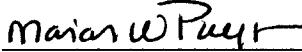
the defendant did unlawfully and knowingly, possess, pass, bring into the United States, and sell counterfeit gold coins, in resemblance and similitude of coins of a denomination higher than five cents, coined at a mint of the United States, knowing the same to be false and counterfeit, with the intent to defraud a person of the United States, in violation of Title 18, United States Code, Section 485.

This Criminal Complaint is based on these facts:

- Continued on the attached sheet.


Robert P. Murphy
Complainant's signature
Robert P. Murphy, Special Agent,
United States Secret Service
Robert P. Murphy
Printed name and title

Sworn to before me and signed in my presence.
Date: August 17, 2017


Marian W. Payson
Judge's signature

City and State: Rochester, New York

HONORABLE MARIAN W. PAYSON
UNITED STATES MAGISTRATE JUDGE
Marian W. Payson
Printed name and title

17-mj-4090

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

STATE OF NEW YORK)
COUNTY OF MONROE) SS:
CITY OF ROCHESTER)

ROBERT P. MURPHY, being duly sworn, deposes and says:

1. I am a Special Agent of the United States Secret Service (USSS) and have been so employed since March 1999. I am assigned to the Rochester Resident Agency, where my duties include the investigation of crimes involving the manufacturing, possession, sale, and uttering of counterfeit currency, bars and coins of the United States.
2. I make this affidavit in support of a criminal complaint charging TIMOTHY MEACHAM (a/k/a STEPHEN FORSYTHE) with violating Title 18, United States Code, Section 485 (possession and sale of counterfeit coins).
3. The statements contained in this affidavit are based upon my personal observations and investigation of this matter, information provided to me by other law enforcement officers, information provided to me by witnesses with personal knowledge of events, my review of physical evidence and records, and my training and experience as a Special Agent. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. Rather, I have set forth only the facts I believe are necessary to establish probable cause to believe that TIMOTHY MEACHAM did violate Title 18, United States Code, Section 485.

4. As is set forth more fully below, there is probable cause to believe the defendant did pass, utter, publish, sell, possess, or bring into the United States, false, forged or counterfeit coins, in resemblance and similitude of United States coins of denominations higher than five cents, coined at mints of the United States, knowing the same to be false, forged, or counterfeit, with the intent to defraud a person of the United States in violation of Title 18, United States Code, Section 485.

5. On May 16, 2017, R.S., an individual from Pennsylvania, contacted the USSS Rochester Office and reported that he was the victim of a fraudulent counterfeit coin sale in Rochester, NY. I spoke with R.S., who stated he purchased two fake United States coins from an individual named "STEPHEN FORSYTHE," which "FORSYTHE" had advertised on Craigslist.com as genuine and authentic gold United States coins. As is explained in more detail below, "FORSYTHE" has been identified as TIMOTHY MEACHAM. Craigslist.com is an American classified advertisements website with sections devoted to the sale of goods, among other things. R.S. reported that he contacted MEACHAM aka "FORSYTHE" after viewing the Craigslist ad, and expressed interest in purchasing the coins. During the ensuing conversation, MEACHAM aka "FORSYTHE" told R.S. he was selling the coins to obtain money to pay for a funeral. The coins appeared to be a 1926 Saint Gaudens \$20.00 piece and a 1929 Indian Head \$5.00 piece. R.S. reported he communicated with MEACHAM aka "FORSYTHE" via telephone number 585-484-9051, and through the Craigslist website. R.S. stated he ultimately arranged for an in-person meeting at the Tim Horton's located on Mt. Hope Ave. in Rochester, New York, which took place on May 15, 2017.

6. R.S. reported that during his meeting with MEACHAM aka "FORSYTHE," at Tim Hortons, R.S. inspected the above-described coins, and was told by MEACHAM that they were authentic and that MEACHAM had inherited the coins from his deceased grandfather. Believing the coins were authentic and genuine, R.S. purchased the two coins for \$5,000.00 cash. R.S. became aware that the coins were not authentic after he had one of the coins examined by a coin retailer in Pennsylvania. The retailer advised R.S. the coin did not contain gold and was counterfeit. After learning the coins were not genuine, R.S. attempted to contact MEACHAM aka "FORSYTHE" at 585-484-9051. R.S. stated that the phone number was no longer operational and that the original Craigslist ad had been removed from the website.

7. On May 16, 2017, after speaking with R.S., I responded to the Tim Horton's located at 1286 Mount Hope Avenue, Rochester, New York. There I reviewed surveillance video, which depicted R.S. and MEACHAM aka "FORSYTHE" engaged in the transaction described above. The video shows R.S. and MEACHAM talking as well as an exchange of the coins and money. I then contacted R.S., who provided the counterfeit coins to the USSS to be stored as evidence.

8. I examined the coins provided by R.S. and observed that both were in resemblance and similitude of United States coins, coined at mints of the United States, of denominations higher than five cents. One coin appeared to be a 1926 Saint Gaudens \$20.00 piece, which is a gold coin, coined at a mint of the United States. An authentic 1926 Saint Gaudens coin is gold in color, weighs 33.40 grams and displays the inscriptions "United States of America, Twenty Dollars" on one side, and "Liberty" on the other side. The 1926 Saint Gaudens piece sold to R.S. was in resemblance and similitude to an

authentic United States 1926 Saint Gaudens gold coin in all of these respects. The other coin appeared to be a 1929 Indian Head \$5.00 piece, which is also a gold coin, coined at a mint of the United States. An authentic Indian Head piece is gold in color, weighs 8.36 grams, and displays the inscriptions "United States of America," "E Pluribus Unum," and "In God We Trust" on one side, and "Liberty, 1929" on the other side. The 1929 Indian Head \$5.00 piece sold to R.S. was in resemblance and similitude to an authentic United States 1929 Indian Head gold coin in all of these respects. Despite the coins' resemblance and similitude of authentic United States gold coins, closer examination revealed that both coins are counterfeit due to specific irregularities that, based on my training and experience, indicate the coins are not authentic United States gold coins. I thereafter brought the coins to a third-party coin expert, who confirmed the coins are in fact counterfeit and are not authentic United States gold coins. In addition to other factors, the third-party expert and I were able to observe under close inspection that the coins were actually not of the correct weight and not made of genuine gold. In addition, the coins were contained in what appeared to be genuine "Professional Coin Grading Service" (PCGS) coin holders. (PCGS is an American coin grading, authentication, attribution, and encapsulation service founded in 1985). Closer inspection, however, revealed that both of the holders were fake, as the print font size used on the labels was incorrect. The precise composition of the coins would not have been readily observable to R.S. at the time of the sale and based on my training and experience, would not have been observable without the use of instruments to accurately measure weight and metal content. Based on my observations, training and experience, the coins were calculated to deceive a person exercising ordinary caution and observation in the transaction of business.

9. On May 17, 2017, investigative searches revealed phone number 585-484-9051 was issued by a company called Bandwith.com, which is a Voice-Over-Internet-Provider (VOIP). VOIP is a technology/service that allows a person to make voice calls using a broadband internet connection instead of a regular (or analog) phone line. I contacted Bandwith.com, who instructed a subpoena was required to be sent to Talktone, Inc. in Sunnyvale, CA, to obtain relevant subscriber information for the VOIP phone number 585-484-9051.

10. On May 24, 2017, a subpoena was issued to Talktone, Inc., for any and all information connected to phone number 585-484-9051. Talktone, Inc. responded with records revealing that phone number 585-484-9051 was issued to the display name of "STEPHEN FORSYTHE" and phone number 585-981-0876 was connected to the account.

11. On or about May 30, 2017, investigative searches revealed TIMOTHY MEACHAM was the owner phone number 585-981-0876. Further investigative searches also revealed a photograph and address for TIMOTHY MEACHAM. Based on this information, I arranged to have a photo-array prepared for a potential identification by R.S.

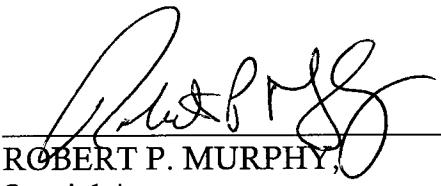
12. On June 13, 2017, I traveled to Pennsylvania and interviewed R.S. who provided a signed statement of fact confirming the information he provided on May 16, 2017. On the same date, I administered a photo array to R.S., which contained TIMOTHY MEACHAM'S photograph. R.S. immediately identified TIMTOHY MEACHAM as "STEPHEN FORSYTHE," the individual who sold R.S. the counterfeit coins at the Tim Horton's in Rochester New York.

13. On June 20, 2017, I interviewed C.M. with regard to a Citi Mastercard ending in #8433 that was used to pay the Talktone, Inc., VOIP account for phone number 585-484-9051. C.M. confirmed credit card number ending in #8433 was issued to her and an individual named TIMOTHY MEACHAM is an authorized user of the card and is listed on the account. C.M. stated she was a former guardian for TIMOTHY MEACHAM when he was growing up and that is why she lets him use the card as an authorized user. C.M. stated she did not make the Talktone, Inc., VOIP account purchase.

14. On or about June 23, 2017, I interviewed TIMTOHY MEACHAM at his residence. MEACHAM admitted to purchasing the Talktone, Inc., VOIP phone number 585-484-9051 and also admitted to meeting R.S. at the Tim Horton's on Mt. Hope Avenue, Rochester, New York in order to sell coins. MEACHAM further admitted to selling the coins in question for \$5,000.00 and that he was well aware that the coins were replicas and not genuine, gold United States coins. MEACHAM stated he purchased the coins from China via the internet for approximately \$72.00 each. MEACHAM stated he masked his identity by using the alias "STEPHEN FORSYTHE" and admitted to posting the advertisement of the coins on Craigslist to make money. MEACHAM stated he deposited the \$5,000.00 from R.S. into his bank account at Canandaigua National Bank and spent the money on wedding expenses and general purchases. MEACHAM expressed remorse that he misled and defrauded R.S. into purchasing false coins. MEACHAM stated he made a "poor decision," and he was financially desperate when he misled R.S. in the sale of the coins. MEACHAM provided this writer a signed statement of fact admitting to knowingly selling false United States coins to R.S.

CONCLUSION

WHEREFORE, based on the forgoing, I respectfully submit that there is probable cause to believe that TIMOTHY MEACHAM did knowingly violate Title 18, United States Code, Section 485, in that TIMOTHY MEACHAM possessed, passed, and sold counterfeit gold coins knowing the same to be false and counterfeit with the intent to defraud a person of the United States.



ROBERT P. MURPHY,
Special Agent
United States Secret Service

Subscribed to and sworn before me
this 17 day of August, 2017.



HON. MARIAN W. PAYSON
United States Magistrate Judge